REMARKS

Claims 1-4, 6, 8-12, 14, 16, 17 and 20 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Leung et al. (U.S. Patent Number 6,466,964, hereinafter "'964") and claim 15 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over '964 in view of Johansson et al. (U.S. Patent Number 6,820,233, hereinafter "'233"). Respectfully disagreeing with these rejections, the applicant requests reconsideration.

Independent claim 1 recites (emphasis added) "receiving, by the communication infrastructure, **a session response message** that indicates a destination IP address and a destination communication port for the packet communication session." Independent claim 20 recites (emphasis added) "**a packet controller capable of receiving a session response message** that indicates a destination IP address and a destination communication port for the packet communication session." On page 2 of the present office action, the Examiner asserts that '964 teaches this claim language, stating that a "Foreign Agent receives packet from Home Agent and Fig. 5 with IP header has destination address and destination port." '964 begins a discussion of Fig. 5 on column 11, line 65. '964 column 11, line 65 – column 12, line 42 reads as follows (emphasis added):

> As described above, **the Foreign Agent composes and sends a registration request on behalf of the node wishing to send and receive packets via the Foreign Agent.** The RFC provides a format for a registration request packet as well as optional extensions. **FIG. 5 is a diagram illustrating a registration request having an extension that may be sent by a Foreign Agent** in accordance with an embodiment of the invention. As shown, a registration request packet 502 includes an IP Header 504 as defined in RFC 791 . As is well-known in the field, the IP Header 504 includes a version field 506 which specifies which versions of the Internet Protocol are represented in the registration request packet 502 . An Internet Header Length (IHL) field 508 provides the length of the IP header 504 . In addition, a Type of Service field 510 is used to specify how the registration request packet 502 is to be handled in networks which offer various service qualities. A Total Length field 512 gives the length of the registration request packet in bytes. In addition, an Identification field 514 is a unique value chosen by the sender to allow a recipient to reassemble a packet that had been separated into fragments. A Flags field 516 and a Fragment Offset field 518 are both to separate an IP registration request packet into fragments to traverse networks that are unable to handle large IP packets. A Time to Live field 520 is used to limit the number of times an individual IP packet may be forwarded. Thus, the Time to Live field 520 may be used to indicate whether the node

has previously registered through another foreign agent, as described above. A Protocol field 522 is used by the IP layer to determine which higher layer protocol created the "payload," or data passed down from the higher layer protocol, within the IP packet. A Header Checksum field 524 is used by a receiving node to verify that there was no error in transmission of the IP-header portion of the packet. In addition, the IP Header 504 includes a **source address 526** and a destination address 528 of the registration request packet 502.

A UDP Header field 530 is provided by RFC 768 . In addition, the UDP Header field 530 includes a **Source Port field 532**, which may be selected by the Foreign Agent sending the registration request packet 502 . In addition, the Foreign Agent may set Destination Port field 534 to 434 , the value reserved for Mobile IP registration messages. UDP Length field 536 provides the size of the UDP Payload (i.e., the Mobile IP fields) measured in bytes. In addition, a Checksum field 538 permits a receiving node to determine if an error occurred in transmission.

Independent claim 1 recites (emphasis added) "determining, by the communication infrastructure, **a source IP address** and **a source communication port** for the packet communication session." Independent claim 20 recites (emphasis added) "a packet controller capable of...determining **a source IP address** and **a source communication port** for the packet communication session." The Examiner cites blocks 526 and 532 in Fig. 5 as teaching this claim language. The paragraph describing these blocks is quoted above.

Independent claim 1 recites (emphasis added) "**receiving, by the communication infrastructure from a communication unit, a link-layer packet** for the packet communication session; and **generating, by the communication infrastructure, an IP message header and a UDP message header for the link-layer packet using the source IP address, the source communication port,** the destination IP address, the destination communication port, the link-layer packet, and a set of predetermined values **to produce an internet protocol (IP) packet comprising the link-layer packet.**" Independent claim 20 recites (emphasis added) "a packet controller capable of...**receiving from a communication unit a link-layer packet** for the packet communication session, and **generating an IP message header and a UDP message header for the link-layer packet using the source IP address, the source communication port,** the destination IP address, the destination communication port, the link-layer packet, and a set of predetermined values **to produce an internet**

protocol (IP) packet comprising the link-layer packet." The Examiner cites '964 col. 14, lines 32-37 and the IP header and UDP header of Fig. 5 as teaching this receiving-a-link-layer-packet and message-header-generation claim language. '964 col. 14, lines 8-46 as follows (emphasis added):

> In order to send packets to a corresponding node, the packets must be sent via a Foreign Agent. **In order to route packets to one of the Foreign Agents, the mobile node must have the specific MAC address of the Foreign Agent. As shown, in FIG. 7B , a mechanism for updating the MAC address associated with the virtual Foreign Agent** according to an embodiment of the invention is presented. Each node 722 has an associated IP address 724 . In addition, the node 722 is configured to have a default gateway or "virtual agent IP address" 726 that is associated with the node 722 . As described above with reference to FIG. 7A , the virtual agent IP address is 10.10.1.1. In addition, the node 722 has an associated ARP table 728 that maps each destination IP address 730 to a MAC address 732 . More particularly, when a packet is sent to a Foreign Agent, the MAC address of the Foreign Agent must be specified. Therefore, according to the present invention, the virtual agent IP address 726 is associated with the corresponding MAC address 734 in the ARP table 728 . For instance, the virtual agent IP address 10.10.1.1 may be associated with the MAC address of either the first Foreign Agent 702 or the second Foreign Agent 704.
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> **Since the virtual agent is identified with the appropriate MAC address, as the node roams to a new location, the associated MAC address 734 is updated accordingly. The Foreign Agent may update the MAC address 734 in the ARP table 728** by a performing a gratuitous (i. e., unsolicited) ARP. In this manner, the nodes on the link may be notified that the current mapping in their ARP cache needs to be modified to reflect the virtual Foreign Agent's new link-layer address. The gratuitous ARP may be timer based or event based. By way of example, the Foreign Agent may update the MAC address periodically (e.g., every second or millisecond). As another example, upon detection of the node, the access point could notify the Foreign Agent so that it may update the MAC address in the ARP table. Although this second event based method is more efficient since unnecessary communication is eliminated, this embodiment requires that there be communication between the Foreign Agent and the access point.

However, the applicant submits that '964, as cited by the Examiner, does not teach or suggest generating an IP message header and a UDP message header for the link-layer packet as claimed. In particular, claims 1 and 20 clearly recite that these headers are generated to produce an IP packet that includes the link-layer packet that was received. Since the Examiner cites Fig. 5 as teaching an IP message header and a UDP message header, then the registration request packet 502 of Fig. 5 must be what the Examiner believes corresponds to the IP packet generated by the communication

infrastructure in the present claims. However, the Examiner also cites Fig. 5 as teaching the session response message that the communication infrastructure receives. Claims 1 and 20 clearly recite that this session response message indicates the destination IP address and the destination communication port that is used to generate the IP packet. Thus, information indicated by one message that is received is used in the generation of a different message.

Moreover, it is not clear what the Examiner believes in '964 corresponds to the link-layer packet that is received and then included in the IP packet that is generated. The portion of '964 that the Examiner cites (col. 14, lines 32-37) describes a mechanism for updating the MAC address associated with the virtual Foreign Agent. In particular, '964 says that the "Foreign Agent may update the MAC address 734 in the ARP table 728 by a performing a gratuitous (i. e., unsolicited) ARP." However, the applicant submits that performing an ARP and updating a MAC address in a table does not teach or suggest what is claimed. Again, claims 1 and 20 clearly recite that an IP message header and a UDP message header are generated to produce an IP packet **that includes the link-layer packet that was received**.

Claims 2 and 3 both recite RLP packets; however, the applicant cannot find the teachings in '964 that the Examiner asserts are present. The applicant requests that the Examiner provide specific textual support in '964 to support the present rejection of these claims.

Claim 4 recites (emphasis added) "wherein the wireless communication infrastructure comprises a **dispatch agent gateway (DAG)** and wherein the DAG produces the voice-over-IP packet." The Examiner cites '964 as teaching this claim language; however, the applicant does not see a reference to a DAG in '964. Thus, the applicant submits that '964 does not teach or suggest claim 4.

Claim 11 recites (emphasis added) "wherein the session response message comprises a **SIP invite final response message.**" The applicant cannot find the portion of '964 that the Examiner asserts teaches this clam language. The applicant requests that the Examiner provide specific textual support in '964 to support the present rejection of this claim.

Since none of the references cited, either independently or in combination, teach all of the limitations of independent claims 1 or 20, or therefore, all the limitations of their respective dependent claims, it is asserted that neither anticipation nor a prima facie case for obviousness has been shown. No remaining grounds for rejection or objection being given, the claims in their present form are asserted to be patentable over the prior art of record and in condition for allowance. Therefore, allowance and issuance of this case is earnestly solicited.

The Examiner is invited to contact the undersigned, if such communication would advance the prosecution of the present application. Lastly, please charge any additional fees (including extension of time fees) or credit overpayment to Deposit Account No. **502117 – Motorola, Inc.**

Respectfully submitted,
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